



## WESTMINSTER

June 3, 1999

Mr. Joe Legare  
U.S. Department of Energy  
Rocky Flats Field Office  
P.O. Box 928  
Golden, Colorado 80402-0928

Dear Mr. Legare:

City of Westminster  
Department of  
Public Works  
and Utilities

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The City of Westminster has reviewed the Draft Solar Ponds Plume Decision Document and appreciates the opportunity to comment on this important document. We are concerned that the Decision Document is being issued prior to the completion of the treatability studies for this remedial action. Information on the specific media to be employed in the treatment cells is also not included in the document. There are many other contaminants in the solar pond plume that iron filings will not remove.

Westminster supports the use of the Reactive Barrier Design alternative with the addition of wetlands for additional nitrate removal and a detention facility on Walnut Creek at Indiana to allow for sedimentation of any other contaminants that could flow into Walnut Creek from the solar pond area. We would also urge the Department of Energy (DOE) to use phytoremediation (planting cottonwood trees) for additional removal of nitrate from the groundwater.

The Department of Energy has acknowledged that building an 850 foot long collection system with passive flow-through treatment cells containing reactive iron will not fully cover the extent of the plume and a large quantity of the plume flow will bypass the barrier. The Decision Document does not provide adequate information as to what amount of the groundwater plume flows will not be collected by the barrier but will flow into Walnut Creek without treatment. We request that this information as well as documentation regarding performance monitoring, methods for replacing the reactive barrier media, as well as the ability of the barrier to withstand a 100 year flood be included in the final document.

Monitoring data indicate that higher concentrations of nitrate are likely in the future and are moving toward North Walnut Creek. The Future exceedances of the 10mg/l stream standard for nitrate is likely with the higher concentrations of nitrate reaching Walnut Creek between the years 2005 and 2010. The draft document does not include what additional measures will be taken by DOE to protect Walnut Creek from the additional nitrate loading. Wastewater treatment plants located on Walnut Creek could exceed their nitrate level discharge permits due to the additional amount of Nitrate flowing into the Creek from the Solar pond plume

At least two reactive treatment cells should be operated in series to provide a backup treatment should the initial cell fail to remove all the contaminants. A back up cell would also be useful when one of the barriers require maintenance. Westminster also requests that monitoring include routine effluent testing of the first treatment cell to detect breakthrough and allow for replacement of the treatment media in the first cell before the second cell can be compromised.



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A 3D map showing the movement of groundwater contamination both horizontally and vertically has not been produced. The Draft Decision Document indicates that preparation of these maps is too costly to undertake. We urge the DOE to provide funding for the 3D mapping of the groundwater. It would be very beneficial to our community to have information on anticipated groundwater movement for the future. Preparation of the map would also aid the DOE and the community in determining appropriate remediation to protect offsite areas from future potential migration of contaminated groundwater.

We would urge the DOE to include a provision in the final Record of Decision for replacement of the barrier in the event that it fails. Given the fact that the remediation of the solar pond groundwater plume is expected to take greater than thirty years there needs to be a commitment from the Department to upgrade or completely replace the barrier with current technology at some point in the future.

Thank you for the opportunity to comment on this document. As you are aware, the City of Westminster is very concerned about offsite migration of plutonium and other contaminants into the Westminster community from Walnut Creek. Remediation activities that would serve to further contaminate Walnut Creek flows are not supported.

Sincerely

Mary Harlow  
Rocky Flats Coordinator

Cc: Ron Hellbusch, City of Westminster  
Kelly DiNatale, City of Westminster  
Tom Settle, City of Westminster  
Lee Johnson, Carlson, Hammond & Paddock